

FOR THE NORTHERN DISTRICT OF OHIO
WESTERN DIVISION

RODNEY LYNCH, et. al.,)	CASE NO.: 3:01 CV 7584
)	
Plaintiffs,)	THE HONORABLE DAVID A. KATZ
)	
v.)	
)	
SC JOHNSON & SON, INC., et. al.,)	
)	<u>Defendant's Expert Witness List</u>
Defendants.)	
)	

COMES NOW Defendant SC Johnson & Son, Inc., pursuant to Federal

Rules of Civil Procedure 26(a)(2), identifies the following as expert witnesses:

(1) Joel Burdick, Ph.D. – Dr. Burdick is a former employee of SC Johnson who will testify regarding matters learned in the course of his employment with the Company. It is anticipated that Dr. Burdick will testify regarding the safety of AllerCareTM carpet powder. Dr. Burdick will further testify regarding the topics discussed in his deposition taken on October 23, 2002. Dr. Burdick's C.V. is attached. Dr. Burdick is compensated at a rate of \$150 per hour for his work related to this matter. Dr. Burdick has not testified as an expert witness in any matters in the last four years.

(2) Richard Lewis, M.D., MPH – It is anticipated that Dr. Lewis will testify regarding the health claims made by the Plaintiffs and their alleged exacerbated respiratory and allergic responses as a result of their exposure to AllerCareTM carpet powder. Dr. Lewis will further testify consistent with the opinions set forth in his report to be provided on or before February 24, 2003. Dr. Lewis' C.V. is attached. Dr. Lewis is compensated at a rate of \$300 per hour for his work related to this matter. Dr. Lewis will provide information with his expert report regarding cases, if any, he has testified in as an expert witness in the last four years.

(3) Thomas G. Osimitz, Ph.D., D.A.B.T. – It is anticipated that Dr. Osimitz will testify regarding the safety of AllerCareTM carpet powder. Dr. Osimitz will further testify regarding the topics discussed in his deposition taken on November 18, 2002 and consistent with the opinions set forth in his report to be provided on or before February 24, 2003. Dr. Osimitz's C.V. is attached. Dr. Osimitz is compensated at a rate of \$250 per hour for his work related to this matter. Dr. Osimitz has not testified as an expert witness in any matter in the last four years.

(4) Muhilan Pandian, Ph.D., MBA and Jeffrey Driver, Dr.P.H., D.A.B.T., M.T., C.L.S. – It is anticipated that Dr. Pandian and Dr. Driver will testify regarding the exposure of Ellen Lynch, Ethan Lynch and Thomas Lynch to the AllerCareTM carpet powder and the nature of benzyl benzoate. Dr. Pandian and Dr. Driver will further testify consistent with the opinions set forth in their report to be provided on or before February 24, 2003. Dr. Pandian's and Dr. Driver's C.Vs. are

attached. Dr. Pandian and Dr. Driver are compensated at a rate of \$300 per hour for their work related to this matter. Dr. Padian and Dr. Driver have not testified as expert witnesses in the last four years.

(5) Kevin J. Renskers, Ph.D. – Dr. Renskers has functioned as the corporate representative for defendant Takasago. It is anticipated that Dr. Renskers will testify regarding the safety of the fragrance used in the AllerCareTM carpet powder. Dr. Renskers will further testify regarding the topics discussed in his deposition taken on January 16, 2003 and those set forth in his peer-reviewed publication (Fukayama, MY, Easterday, OD, Serafino, PA, Dickens, MS, Renskers, KJ, North-Root, H, Schrankel, K. Subchronic inhalation studies of complex fragrance mixtures in rats and hamsters. *Toxicology Letters* 1999;111:175-187). Dr. Renskers' C.V. is attached. Dr. Renskers is not receiving additional compensation for his work on this matter outside his normal compensation from defendant Takasago International Corporation. Dr. Renskers has not testified as an expert witness in the last four years.

(6) Max Wiznitzer, M.D. – It is anticipated that Dr. Wiznitzer will testify regarding pediatric neurology issues. Dr. Wiznitzer will further testify consistent with the opinions set forth in his report to be provided on or before February 24, 2003. Dr. Wiznitzer's C.V. is attached. Dr. Wiznitzer is compensated at a rate of \$350 per hour for his work related to this matter. Dr. Lewis will provide information with his expert report regarding cases, if any, he has testified in as an expert witness in the last four years.

Per agreement of the Parties, SC Johnson will provide its expert reports to Plaintiffs' counsel on or before February 24, 2003.

Respectfully submitted,

s/ Michael L. Hardy

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CERTIFICATE OF SERVICE

I certify that a copy of the DEFENDANT'S EXPERT WITNESS LIST was filed electronically with the Court on February 18, 2003. Notice of this filing will be sent to all parties by operation of the Court's electronic filing system.

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